

June 8, 2021

Ms. Valerie Fulcher  
Environmental Program Specialist  
Virginia Department of Environmental Quality  
Office of Environmental Impact Review  
P.O. Box 1105  
Richmond, VA 23218

RE: Coastal Zone Management Act Consistency Determination  
New Concourse Development – Short Form Environmental Assessment  
Washington Dulles International Airport, Fairfax County, Virginia

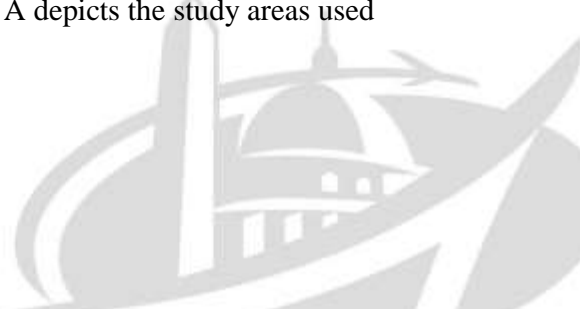
Dear Ms. Fulcher:

The Metropolitan Washington Airports Authority (Airports Authority) is preparing a Short Form Environmental Assessment (EA) to consider the potential environmental effects associated with the development of a new concourse and demolition of the Concourse A regional aircraft gates (Proposed Action) at Washington Dulles International Airport (the Airport or IAD). The Airports Authority is working with the Federal Aviation Administration (FAA) to prepare the EA in accordance with the National Environmental Policy Act (NEPA); the Council on Environmental Quality Regulations (40 Code of Federal Regulations 1500-1509); FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

As part of the EA, this letter provides the Airports Authority Consistency Certification, and necessary data and information, under the Coastal Zone Management Act (CZMA) Section 307 (c)(3)(A) and 15 Code of Federal Regulations Part 930, sub-part C, regarding the New Concourse Development. The Airports Authority is providing this letter as certification that the Proposed Action complies with all enforceable policies of Virginia's Coastal Zone Management Program (CZMP) and will be conducted in a manner consistent with the CZMP.

### **Project Background**

The Airport is located approximately 4 miles west of Reston, Virginia, between the Dulles Greenway (Virginia State Route 267) to the north, Lee Jackson Memorial Highway (US Highway 50) to the south, Sully Road (Virginia State Route 28) to the east, and Loudoun County Parkway (Virginia State Route 606) to the west. The Proposed Action would be located at the Airport in Loudoun and Fairfax counties. Additional information on the Proposed Action is provided in Attachment A. The Virginia Coastal Zone includes all of Fairfax County, including portions of the Airport and the Proposed Action study areas. Exhibit 1 in Attachment A depicts the study areas used



to assess the potential effects on environmental resources in the Short Form EA. The Direct Study Area is used to assess direct impacts and encompasses the areas expected to be directly affected during construction and operation of the Proposed Action. The General Study Area is the area that has the potential to be indirectly affected by construction, construction staging, or operation of the Proposed Action.

The existing Concourse A regional aircraft gates were designed to support small (50 seats and under) ground-loaded regional aircraft operations and are now functionally obsolete as airlines serving IAD accelerate the retirement of turboprop and 50-seat regional jet aircraft in favor of larger regional aircraft. As a result, airlines are finding the layout of the confined apron adjoining the Concourse A regional aircraft gates operationally inefficient for maneuvering and servicing these larger regional aircraft into and out of existing parking positions. Therefore, servicing aircraft and airlines are unable to use the gates effectively. In addition, many of the passengers accommodated on the regional aircraft are connecting to or from aircraft that operate at Concourse C/D. The existing connection between the Concourse A regional aircraft gates and Concourse C/D requires bussing or difficult pedestrian movements with numerous level changes, resulting in a poor level of service for passengers.

The Proposed Action is intended to address the physical, operational, and connectivity deficiencies of the Concourse A regional aircraft gates and to allow activity served at those gates to be accommodated in modern facilities with contact gates. Following construction of the new concourse, the Concourse A regional aircraft gates would be demolished, and the site graded and repaved to accommodate off-gate aircraft parking and occasional ground service equipment parking. The purpose of the Proposed Action is to allow relocation of activity currently accommodated in the non-historic, obsolete, and inefficient Concourse A regional aircraft gates into concourse facilities served by modern contact gates connected to the existing east AeroTrain station and pedestrian tunnel to Concourse C/D, eliminating the existing inconvenient connection to Concourse C/D. The Proposed Action and existing conditions are shown on Exhibits 2 and 3, respectively, in Attachment A.

The Proposed Action would include construction of a new three-story concourse with contact gates (approximately 535,000 square feet [sq ft] within Fairfax County); demolition of the ground level Concourse A regional aircraft gates, and conversion of the site to hardstands for aircraft parking and potential ground service equipment storage; and installation of underground utilities, including fiber optics and potentially electric lines (approximately 610 linear feet within Fairfax County). The Proposed Action would result in approximately 134,000 sq ft of new impervious surface within Fairfax County. The total area of construction for the Proposed Action is quantified in Attachment A.

Construction of the Proposed Action is scheduled to begin in 2023, with anticipated completion within 18 months, including construction of the new concourse and underground utilities, demolition of the existing Concourse A regional aircraft gates, and improvements to the Concourse A

regional aircraft gates site. The construction timeframe is subject to completing the federal environmental review process, obtaining all environmental permits, and completing the design.

### **Coastal Zone Consistency Evaluation**

The following paragraphs address the enforceable policies of Virginia's Coastal Zone Management Program:

#### **Tidal and Non-Tidal Wetlands**

Based on a review of the National Wetlands Inventory (NWI) map, April 2021 field reconnaissance,<sup>1</sup> recent aerial photography, and previous delineations on the Airport, no tidal or non-tidal wetlands or non-tidal surface waters are present within the Direct Study Area. The nearest wetland is approximately 1,800 feet east of the Direct Study Area and the nearest surface water is approximately 1,300 feet south of the Direct Study Area.

Surface water quality in the vicinity of the General Study Area would be maintained by adhering to the Virginia Erosion and Sediment Control Regulations and the *Virginia Erosion and Sediment Control Handbook*. Under these programs, a project-specific erosion and sediment control plan, approved by the Airports Authority Building Codes/Environmental Department, would be developed. As such, no impacts to tidal or non-tidal wetlands or non-tidal surface waters would occur.

#### **Subaqueous Lands**

There are no Commonwealth-owned river bottomlands within the Direct Study Area. The Virginia Marine Resources Commission (VMRC) regulates and maintains permit authority for any structures built in subaqueous lands within the jurisdiction of the Commonwealth.

#### **Dunes and Beaches**

The Coastal Primary Sand Dune Act defines several localities in the Commonwealth of Virginia in which jurisdictional dunes are to be protected. Fairfax County is not one of the localities identified in the Coastal Primary Sand Dune Act as containing VMRC-jurisdictional dune resources. Therefore, no impacts to jurisdictional dune resources would occur.

#### **Chesapeake Bay Preservation Areas**

Virginia's Chesapeake Bay Preservation Act requires local tidewater governments to designate and protect Chesapeake Bay Preservation Areas, which include any areas delineated by a local government in accordance with criteria established pursuant to the Code of Virginia. Fairfax County has adopted Chesapeake Bay Preservation Areas in its

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<sup>1</sup> Coastal Resources, Inc., IAD Concourse A Replacement Field Reconnaissance, May 12, 2021.

Chesapeake Bay Preservation Ordinance and separates Chesapeake Bay Preservation Areas into two categories of land use:

- *Resource Protection Areas* protect the existence and quality of state waters and include a 100-foot buffer adjacent to and landward of these features. The Code of Virginia (§62.1-44.3) defines state waters as all water, on the surface or in the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction. As shown on Exhibit 1 of Attachment A, a portion of Horsepen Run within the General Study Area is a designated Resource Protection Area. The Direct Study Area does not extend into the 100-foot buffer of this Resource Protection Area.
- *Resource Management Areas* are areas in which improper development has the potential to degrade water quality. All of Fairfax County is designated as a Resource Management Area except for the areas meeting the specific criteria of a Resource Protection Area. The Proposed Action would be designed and constructed in accordance with the erosion, sediment, stormwater quality controls, and pollutant prevention practices required by applicable regulations and permit requirements.<sup>2</sup>

#### Marine Fisheries

The Direct Study Area is entirely on paved or maintained land within the Airport boundary. There are no marine fisheries on or in the vicinity of the Direct Study Area. Therefore, the Proposed Action would not affect marine fisheries.

#### Wildlife and Inland Fisheries

Based on online database reviews and the April 2021 field reconnaissance, the Direct Study Area does not contain any species of concern or provide habitat for species of concern and existing conditions are highly maintained and unlikely to support any of the listed species. There would be no taking or relocation of species, and there would be no loss of critical terrestrial habitat. Construction activities would be limited to on-Airport impervious developed areas and maintained areas. No direct or indirect impacts to wildlife and their associated habitats would occur.

There are no commercial fishery activities near the Airport. Cub Run and Horsepen Run have the potential to provide fish habitat in the vicinity of the General Study Area. While stormwater from the Direct Study Area could potentially drain into Cub Run and Horsepen Run, all construction and operational stormwater management controls would be designed and implemented in accordance with state and local regulations. Therefore, the Proposed Action would not significantly affect water quality of Cub Run and Horsepen Run and no direct or indirect impacts to fish species or habitat would occur.

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<sup>2</sup> Fairfax County, Chesapeake Bay Preservation Ordinance, <https://www.fairfaxcounty.gov/landdevelopment/chesapeake-bay-preservation-ordinance> (accessed May 17, 2021).

*Plant Pests and Noxious Weeds*

Construction of the Proposed Action would result in the disruption and paving of maintained areas of the airfield. Under the Proposed Action, no soil would be hauled from or transported to off-Airport sources and any necessary reseeded would use seed mixes identified in the IAD Airport Design Standards and Signing Guidelines.<sup>3</sup>

*Commonwealth Lands*

There are no Commonwealth-owned lands within the General Study Area. Construction of the Proposed Action would not include any proposed activity on Commonwealth lands.

*Point Source Air Pollution*

The Proposed Action would not create a new point source of air pollutant emissions or modify an existing point source. Construction emissions associated with the Proposed Action would be temporary in nature and would be below established *de minimis* thresholds. No significant adverse impacts would be expected to result from construction of the Proposed Action.

Operationally, the Proposed Action would not result in more activity at the Airport, nor would it result in an increase in vehicle use or traffic, when compared to the No Action Alternative. As such, any change in operational emissions associated with the Proposed Action would be well below the established *de minimis* thresholds and would not be considered regionally significant. Adverse air quality impacts are not expected to result from implementation of the Proposed Action.

*Point Source Water Pollution*

Virginia Erosion and Sediment Law requires that soil-disturbing projects be designed and constructed to reduce soil erosion and decrease potential inputs of chemical nutrients and sediments into Chesapeake Bay Preservation Areas, which include the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth of Virginia. These waters include Cub Run and Horsepen Run, which are south and east of the Direct Study Area on Airport property.

All operational activities conducted at the Airport are managed in accordance with the provisions and requirements of the Airports Authority's Multi-Sector General Permit (MSGP) for the Airport. As part of the MSGP and as required by the Virginia Department of Environmental Quality (VDEQ), the Airports Authority maintains a Stormwater Pollution Prevention Plan (SWPPP) that includes all major Airport tenants as co-permittees. Depending on the ultimate design of any new proposed components and any subsequent changes to the

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<sup>3</sup> Metropolitan Washington Airports Authority, *Design Manual IAD Volume 1: Washington Dulles International Airport, Airport Design Standards and Signing Guidelines*, January 2010.

stormwater characteristics or outfalls, a modification to the existing stormwater permit and SWPPP may be required.

The Proposed Action would be designed to manage stormwater runoff in accordance with the storage and pre- and post-flow requirements of the Virginia Stormwater Management Program, FAA Advisory Circular 150/5320-5D, *Airport Drainage Design*,<sup>4</sup> Virginia stormwater management regulations, the Virginia post-construction best management practices, and the Airports Authority Design Manual.<sup>5</sup> Changes to the impervious surface area within the Direct Study Area are expected to be minimal, approximately 376,000 sq ft of new impervious surface, but all existing permits would be updated, as necessary.

#### Nonpoint Source Water Pollution

All construction plans and contracts would be prepared in accordance with FAA Advisory Circular 150/5370-10H, *Standard Specifications for Construction of Airports*,<sup>6</sup> which includes requirements regarding temporary air and water pollution, soil erosion, and siltation control. All necessary erosion and sediment control measures would be implemented prior to beginning construction. In accordance with the Airports Authority's MSGP for the Airport, a Notice of Intent would be submitted to the US Environmental Protection Agency and coverage for the construction activity would fall under a Construction General Permit. Construction of the Proposed Action would be regulated through the National Pollutant Discharge Elimination System (NPDES) via the Virginia Pollutant Discharge Elimination System (VPDES) as administered by VDEQ.

The VDEQ manages potential erosion and protects water resources through the issuance of VPDES construction permits. The Proposed Action is unlikely to have significant, adverse, and permanent impacts on water quality. As discussed above, the Airports Authority Design Manual would require erosion and sediment control measures in accordance with NPDES regulations, Virginia Erosion and Sediment Control regulations, and the *Virginia Erosion and Sediment Control Handbook*. Additionally, all necessary erosion and sediment control and pollution prevention measures would be implemented prior to beginning each element of construction. The Proposed Action would be constructed in accordance with all applicable permits, including the VPDES permit as administered by VDEQ and the Airports Authority's existing MSGP for the Airport.

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<sup>4</sup> US Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5320-5D, *Airport Drainage Design*, August 15, 2013.

<sup>5</sup> Metropolitan Washington Airports Authority, *Design Manual: Ronald Reagan Washington National Airport, Washington Dulles International Airport*, May 2014.

<sup>6</sup> US Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5370-10H, *Standard Specifications for Construction of Airports*, December 21, 2018.

No public groundwater wells or sole-source aquifers are on Airport property or in the immediate vicinity of IAD; therefore, the Proposed Action would have no adverse effect on groundwater resources.

*Shoreline Sanitation*

No septic tanks are located in the vicinity of the Direct Study Area, and the Proposed Action would not include the installation of any new or relocated septic tanks.

**Conclusion**

Through this certification the proposed new concourse development at IAD is consistent with the Virginia Coastal Resources Management Project. The Airports Authority is requesting concurrence within the established timeframes provided in 15 CFR Part 930, §930.39(a).

The Commonwealth's concurrence, objection, or notification of review status shall be sent to:

Mr. Tom Wasaff  
Planning Department  
Metropolitan Washington Airports Authority  
1 Aviation Circle  
Ronald Reagan Washington National Airport,  
Washington, DC 20001-6000  
environmental.comments@mwaa.com

and:

Ms. Susan Stafford  
Federal Aviation Administration  
Beckley Airports Field Office 176 Airport Circle, 1  
Beaver, WV 25813

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregg M. Wollard', written in a cursive style.

Gregg M. Wollard, P.E., P.M.P.  
Manager, Planning Department

Attachment:

Attachment A – Washington Dulles International Airport New Concourse Development  
Project Description

## ATTACHMENT A

# WASHINGTON DULLES INTERNATIONAL AIRPORT NEW CONCOURSE DEVELOPMENT PROJECT DESCRIPTION

The Washington Metropolitan Airports Authority (Airports Authority) proposes to construct a new concourse and demolish the existing Concourse A regional aircraft gates at Washington Dulles International Airport (IAD or Airport) to address physical and operational inefficiencies and improve passenger level of service (Proposed Action). This attachment provides a summary of the purpose and need for the Proposed Action and a description of construction components associated with the Proposed Action. **Exhibit 1** depicts the study areas used to assess the potential effects on environmental resources. The Direct Study Area is used to assess direct impacts and encompasses the areas expected to be affected during construction and operation of the Proposed Action. The General Study Area is the area that has the potential to be indirectly affected during construction, construction staging, or operation of the Proposed Action.

### A.1 PURPOSE AND NEED FOR THE PROJECT

The purpose of the Proposed Action is to allow relocation of activity currently accommodated in the nonhistoric, inefficient Concourse A regional aircraft gates into concourse facilities served by modern contact gates connected to the existing underground east AeroTrain station and to eliminate the inconvenient connection to Concourse C/D.

The Proposed Action is needed to accommodate the changing fleet mix at the Airport and to address the operational and passenger level of service concerns in the Concourse A regional aircraft gates. The existing Concourse A regional aircraft gates, designed to support small (50 seats and under) ground-loaded regional aircraft operations, are functionally obsolete as airlines serving IAD accelerate the retirement of turboprop and 50-seat regional aircraft in favor of larger regional aircraft. As a result, the layout of the confined apron adjoining the Concourse A regional aircraft gates is operationally inefficient for maneuvering and servicing these larger regional aircraft at the existing parking positions. In addition, many of the passengers accommodated on the regional aircraft are connecting to or from aircraft that operate at Concourse C/D. The existing connection between the Concourse A regional aircraft gates and Concourse C/D requires bussing or difficult pedestrian movements with numerous level changes, resulting in a poor level of service for passengers. Moreover, passenger exposure to weather and aircraft ground service operations, which includes aircraft re-fueling trucks, is not consistent with the Airports Authority's pledge to provide the traveling public a safe, predictable, and enjoyable travel experience.

### A.2 COMPONENTS OF THE PROPOSED ACTION

The Proposed Action includes project elements that meet the purpose and need that must be evaluated in the Short Form Environmental Assessment. Airfield areas associated with the various project components are depicted on **Exhibit 2**. The Proposed Action includes the following components:

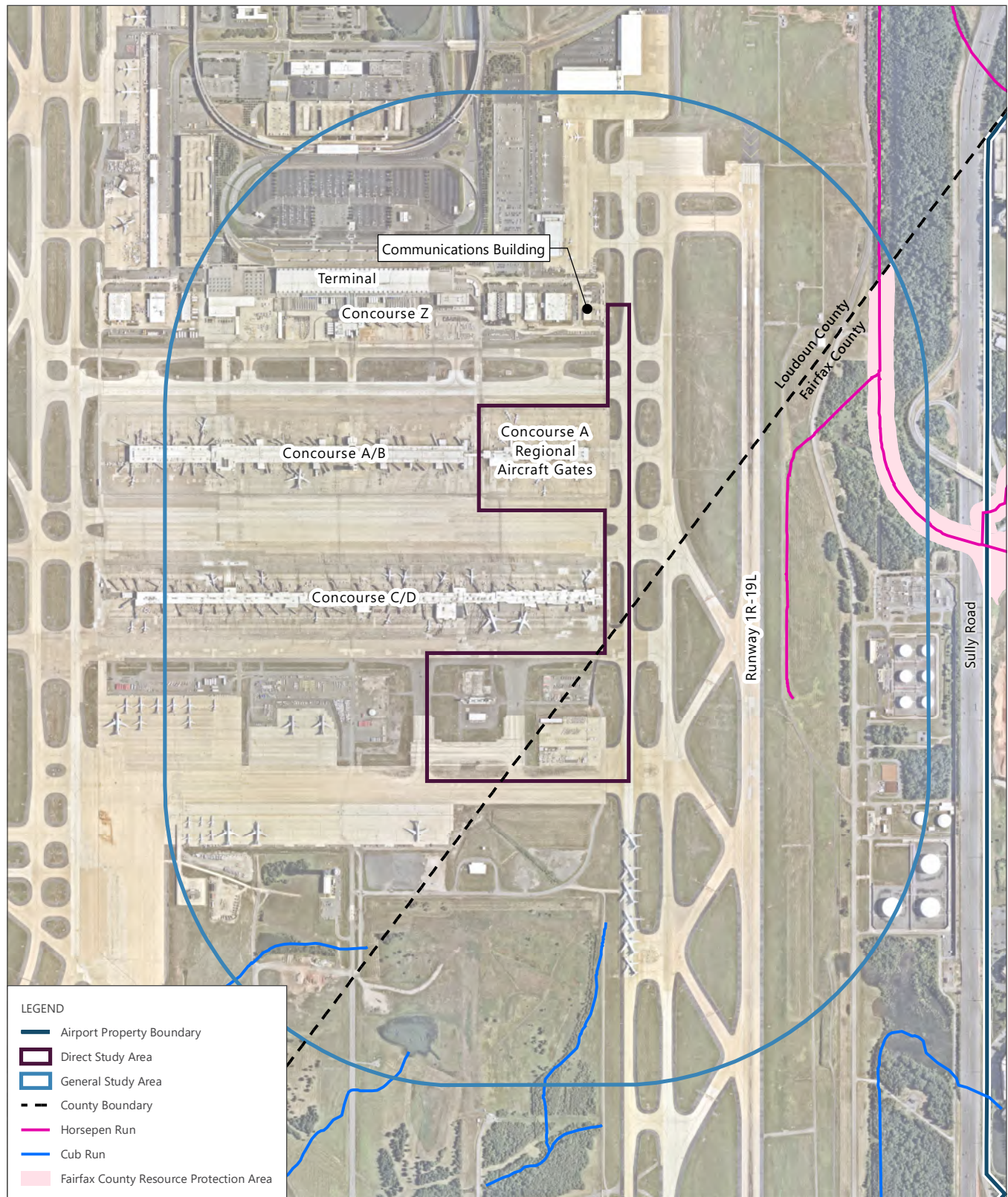
- **construction of a new three-story concourse with contact gates** – The new concourse would be constructed at the existing east AeroTrain station south of Taxiway E and north of Taxiway F in a primarily paved area (see **Exhibit 3**). Unpaved areas have minimal vegetation and are maintained to support Airport operations. The east



AeroTrain station and existing underground infrastructure would remain in place and would serve the new concourse. The new concourse would be surrounded by approximately 1,214,000 square feet (sq ft) apron pavement with a 25-foot-wide service road and would have a 40-foot-wide road for mobile lounges on the north, east, and west sides. Of the total proposed pavement around the new concourse, approximately 482,000 sq ft would be within Fairfax County. It is anticipated most of the existing pavement within the proposed project area would be demolished and reconstructed as necessary; however, existing pavement adjacent to Taxiway F would be evaluated to determine if it could support the Proposed Action. The new concourse would have approximately 415,000 sq ft, 106,000 sq ft within Fairfax County, of usable space on three levels: apron (ground level), concourse level, and club level. The apron level would provide approximately 190,000 sq ft of both closed and open-sided space to be used for airline operations and support; commercial support and storage; Airport administrative and maintenance offices; and mechanical, electrical, and plumbing. The concourse level would be approximately 15 feet above the apron level with approximately 190,000 sq ft for holdrooms, commercial (food and beverage and retail), restrooms, and circulation. The club level would consist of approximately 35,000 sq ft to provide space for an airline club. Passengers would access the proposed concourse via the AeroTrain or the existing Concourse C/C pedestrian tunnel. The existing underground mezzanine level and AeroTrain level would provide direct connections to the proposed concourse. Existing and new vertical circulation elements (elevators and escalators) would be added to connect these underground levels to the new concourse. As depicted on Exhibit 3, construction of the new concourse would require the removal of existing paved areas used to store snow, and snow removal and other miscellaneous equipment. An existing doublewide trailer on the snow removal equipment lot and a three-sided shelter for storing miscellaneous equipment would also be removed. Existing on-Airport storage areas would accommodate the miscellaneous and snow removal equipment, and snow storage during the winter. The trailer and shelter are temporary structures and would not need to be replaced. Construction of the new concourse would result in approximately 376,000 sq ft of new impervious surface on the Airport, 134,000 sq ft within Fairfax County.

- **demolition of the ground level Concourse A regional aircraft gates** – Demolition of the Concourse A regional aircraft gates would be limited to the structure itself (approximately 107,000 sq ft). The area would be graded, repaved as necessary, and repurposed for aircraft hardstand parking and occasional ground service equipment parking after demolition of the gates is complete. Demolished building materials that cannot be recycled onsite would be removed and disposed of in an appropriate off-site facility. The Concourse A regional aircraft gates would remain operational until the new concourse is constructed. Activity served in the Concourse A regional aircraft gates would be relocated and served in the new concourse and Concourse C/D.
- **installation of underground utilities** – A conduit, approximately 3,500 linear feet (610 linear feet within Fairfax County), would be constructed beginning at the east end of the proposed new concourse to contain utilities, including a new fiber optic line to connect the new concourse to the existing communications building. The conduit may also contain an electrical power connection to facilities near the communications building if needed to supplement electrical power that exists within the proposed new concourse footprint. Construction of the conduit would include trenching in the unpaved, maintained areas and boring under the paved areas. No taxiway or taxilane pavement would be disturbed for construction of the conduit.

If approved, construction activities would begin in October 2023 and the project would be completed within 18 months in March 2025, including demolition of the Concourse A regional aircraft gates and improvements to that site. Construction staging and laydown would occur adjacent to the proposed project site, which has been previously disturbed and is currently used for Airport support activities.



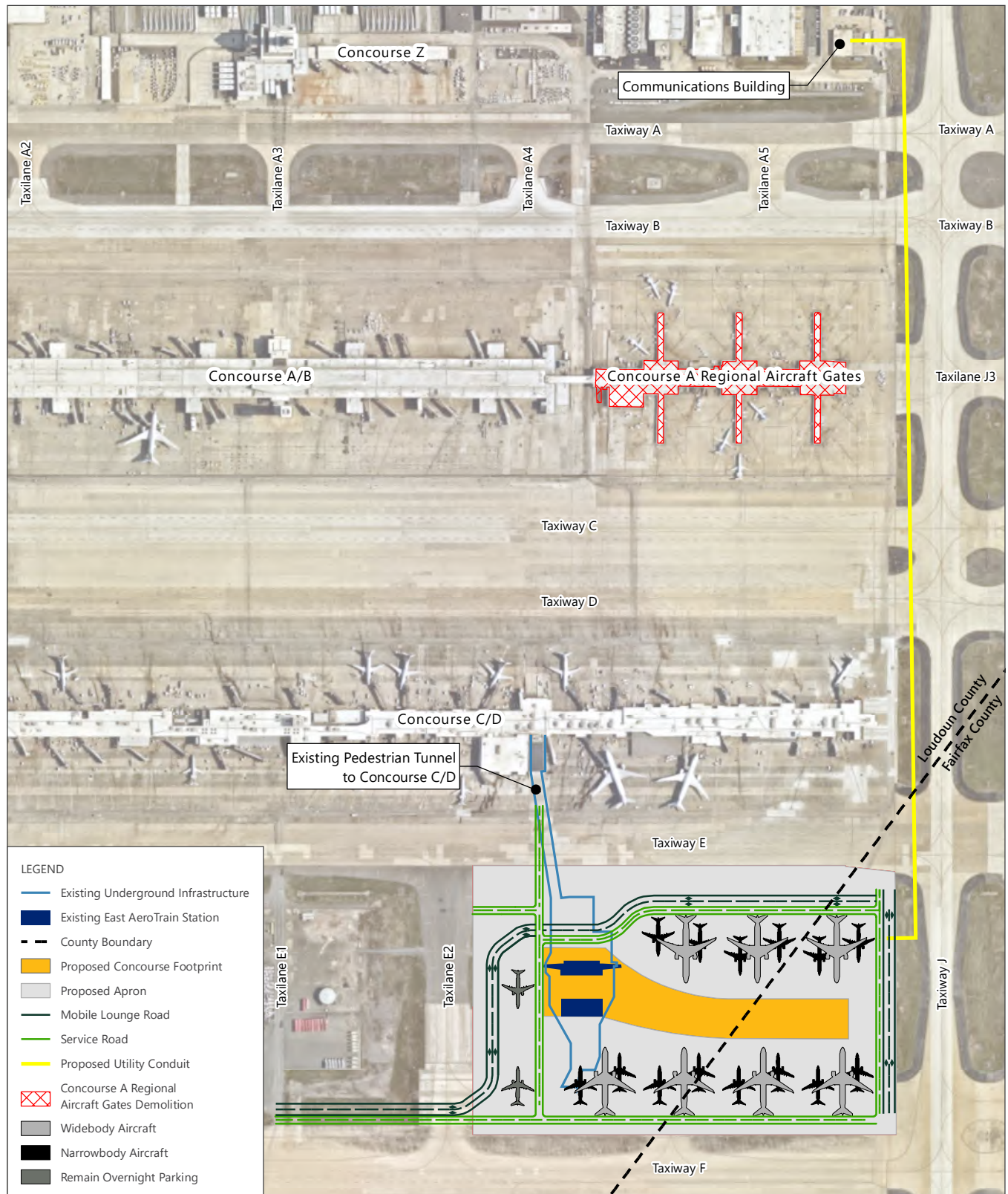
SOURCES: Nearmap, June 2020 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, 2019 (county boundary); Metropolitan Washington Airports Authority, September 2019 (Airport property boundary); Virginia Department of Environmental Quality, 2020 (streams); Fairfax County Open Data, April 2021 (resource protection areas); Ricondo & Associates, Inc., May 2021 (study areas).

EXHIBIT 1



STUDY AREAS





SOURCES: Nearmap, June 2020 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, 2019 (county boundary); Ricondo & Associates, Inc., May 2021 (proposed action).

**EXHIBIT 2**



**PROPOSED ACTION**





SOURCES: Nearmap, June 2020 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, 2019 (county boundary); Ricondo & Associates, Inc., May 2021 (proposed action).

### EXHIBIT 3



## EXISTING AIRPORT FACILITIES